

EXHIBIT 60

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804  
Judge Dan Aaron  
Polster

This document relates to:

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.  
Case No. 17-OP-45004

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al  
Case No. 18-OP-45132

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Videotaped deposition of
CHARLES I. TWIGG, IV

January 8, 2019
9:06 a.m.

Taken at:
Sheraton Suites - Cuyahoga Falls
1989 Front Street
Cuyahoga Falls, Ohio

Renee L. Pellegrino, RPR, CLR

<p style="text-align: right;">Page 226</p> <p>1 16, E-Mail String, Beginning Bates</p> <p>2 Number AKRON_000236377, was marked</p> <p>3 for purposes of identification.)</p> <p>4 - - - - -</p> <p>5 BY MR. CAREY:</p> <p>6 Q. Chief Twigg, welcome back.</p> <p>7 A. Thank you.</p> <p>8 Q. Handing you Exhibit 16, it's Bates</p> <p>9 numbered Akron_000236377. Take a second and</p> <p>10 review the e-mail. Now, you're not actually on</p> <p>11 this e-mail, but I just wanted to ask a little</p> <p>12 bit about the e-mail on the first page here from</p> <p>13 Chief Natko.</p> <p>14 Do you see where he writes that the</p> <p>15 cost per call for a four-person AFD ambulance is</p> <p>16 \$155.05 per call?</p> <p>17 A. I do.</p> <p>18 Q. Do you know how he calculated that</p> <p>19 number?</p> <p>20 MS. FLOWERS: Objection. Calls for</p> <p>21 speculation.</p> <p>22 A. I do not.</p> <p>23 Q. If somebody asked you to calculate</p> <p>24 how much it costs AFD for a four-person</p> <p>25 ambulance to respond to a call, would you know</p>	<p style="text-align: right;">Page 228</p> <p>1 go on the calls anyhow. So it's a distinction</p> <p>2 between us, as a public service, and a private</p> <p>3 ambulance, where we're not in this to make</p> <p>4 money, so spending a lot of time figuring out</p> <p>5 what exactly each call costs us hasn't been a</p> <p>6 priority to us in the past.</p> <p>7 Q. Have you ever attempted to do it?</p> <p>8 MS. FLOWERS: Objection.</p> <p>9 A. I personally have not.</p> <p>10 Q. Do you know if anybody else has</p> <p>11 attempted to calculate how much it costs AFD to</p> <p>12 go on a call?</p> <p>13 A. We've utilized FEMA guidelines for</p> <p>14 what we would charge should we send a med unit</p> <p>15 out of town to assist at another community. I</p> <p>16 know we've done that.</p> <p>17 Q. What about specifically to opioids?</p> <p>18 Has anybody attempted to calculate how much it</p> <p>19 costs AFD to respond to an opioid call?</p> <p>20 MS. FLOWERS: Object to the form.</p> <p>21 A. To my knowledge, nobody has sat down</p> <p>22 and crunched all the numbers that would be</p> <p>23 involved.</p> <p>24 Q. Again going back to the time when</p> <p>25 you were head of the accounting services</p>
<p style="text-align: right;">Page 227</p> <p>1 how to do that?</p> <p>2 MS. FLOWERS: Objection. Asked and</p> <p>3 answered.</p> <p>4 A. I would ask our accounting and</p> <p>5 services bureau manager to develop that number</p> <p>6 for me.</p> <p>7 Q. When you were accounting and</p> <p>8 services manager and if somebody came to you and</p> <p>9 asked you to do that, how would you have gone</p> <p>10 about doing it?</p> <p>11 MS. FLOWERS: Objection. Asked and</p> <p>12 answered.</p> <p>13 A. At the time I would have worked with</p> <p>14 the finance division to calculate, to the best</p> <p>15 of our ability, a cost. What makes that tricky</p> <p>16 is there's so many different ways to do it. So,</p> <p>17 you know, the question would be a difficult one,</p> <p>18 but it's doable.</p> <p>19 Q. What makes it tricky?</p> <p>20 A. There's several variables to take</p> <p>21 into consideration, so I think it would be a</p> <p>22 time-consuming effort, and that's why we don't</p> <p>23 necessarily spend a lot of time figuring out</p> <p>24 exactly what it cost us to go on every single</p> <p>25 call, because at the end of the day, we need to</p>	<p style="text-align: right;">Page 229</p> <p>1 division or bureau, if somebody came to you and</p> <p>2 asked you to calculate how much it costs AFD to</p> <p>3 go on an opioid overdose call, what are all the</p> <p>4 different factors or variables you would include</p> <p>5 in that calculation?</p> <p>6 MS. FLOWERS: Objection. Asked and</p> <p>7 answered.</p> <p>8 A. I don't feel qualified to do that</p> <p>9 kind of -- that kind of work, which is why I</p> <p>10 wouldn't have tried it back then even. So I'm</p> <p>11 not an accountant. I'm a firefighter. I work</p> <p>12 with the accounting -- or the finance division</p> <p>13 to develop these numbers. We don't develop them</p> <p>14 ourselves.</p> <p>15 Q. So during your time as accounting</p> <p>16 services -- as head of the accounting services</p> <p>17 division, if somebody came and asked you that,</p> <p>18 you would have just said no, we can't do it?</p> <p>19 MS. FLOWERS: Object to the form of</p> <p>20 the question. Argumentative.</p> <p>21 A. If somebody asked me when I was in</p> <p>22 that position, I would have responded that I'll</p> <p>23 need to work with the finance department to come</p> <p>24 up with the numbers you're asking me for.</p> <p>25 Q. And when you say "finance</p>

<p style="text-align: right;">Page 230</p> <p>1 department," who is that?</p> <p>2 A. Currently it's the audit and budget</p> <p>3 office as well as the finance office, Steve</p> <p>4 Fricker, Diane Miller Dawson. Those are a</p> <p>5 couple of the names.</p> <p>6 Q. That's not part of the fire</p> <p>7 division, correct?</p> <p>8 A. That's correct.</p> <p>9 Q. Would you have given them any</p> <p>10 instructions on how to go about calculating that</p> <p>11 number?</p> <p>12 MS. FLOWERS: Object to the form.</p> <p>13 A. No. It would not be my place to</p> <p>14 instruct the finance director on how to do their</p> <p>15 job.</p> <p>16 Q. Wouldn't the finance director have</p> <p>17 questions about stuff like what all goes into</p> <p>18 the fire department's response to an opioid</p> <p>19 call?</p> <p>20 MS. FLOWERS: Objection. Calls for</p> <p>21 speculation.</p> <p>22 A. If we try and figure out -- when we</p> <p>23 try and figure out what a specific call costs</p> <p>24 us, we would be expected, I'm sure, to help</p> <p>25 figure out what all things would be figured in.</p>	<p style="text-align: right;">Page 232</p> <p>1 usually -- and we discussed earlier about when</p> <p>2 we need to add an engine to a call instead of</p> <p>3 just a med unit. So somebody that's unconscious</p> <p>4 will always need at least a four-person crew.</p> <p>5 So if we don't have four people on that rig,</p> <p>6 we'll send an engine, and then if that engine</p> <p>7 happens to be combo'd, that's another med unit</p> <p>8 that will be out of service during that call;</p> <p>9 and then if that district has a run, another med</p> <p>10 unit -- hopefully they're in service -- will be</p> <p>11 coming from one or two districts over. And then</p> <p>12 in a short period of time you start running into</p> <p>13 a domino effect, where we're down to one or two</p> <p>14 rigs in the whole city. And when your manpower</p> <p>15 is swamped like that, no one is out doing</p> <p>16 training, they're not doing inspections, they're</p> <p>17 not doing rig maintenance, they're not doing</p> <p>18 building maintenance, and all that is a indirect</p> <p>19 result of increased call volume. That's why we</p> <p>20 increased the manpower in overtime to help cut</p> <p>21 down on that to the best that we could.</p> <p>22 Q. Let's take rig maintenance. You</p> <p>23 mentioned rig maintenance. How is it decided</p> <p>24 whether someone is going to perform rig</p> <p>25 maintenance or not?</p>
<p style="text-align: right;">Page 231</p> <p>1 Q. In your mind, what would figure in</p> <p>2 to calculating such a cost?</p> <p>3 MS. FLOWERS: Object to the form.</p> <p>4 Asked and answered.</p> <p>5 A. Well, we would have to take into</p> <p>6 consideration the number of manpower hours that</p> <p>7 a specific situation was causing us. Take the</p> <p>8 opioids for example. Identify the number of</p> <p>9 calls, identify the overtime that would be</p> <p>10 involved, identify the resources that we expend</p> <p>11 on each of those runs, and then you would try</p> <p>12 and start calculating the more obscure impact</p> <p>13 that it has on the organization with the number</p> <p>14 of resources that have been redirected away</p> <p>15 from, let's say, fire inspections or training.</p> <p>16 You try and work out all those different numbers</p> <p>17 to figure out the -- you know, the true actual</p> <p>18 impact of the situation. It gets complex.</p> <p>19 Q. Can you give me an example of</p> <p>20 diversion of resources that have been caused by</p> <p>21 the opioid epidemic within the fire division?</p> <p>22 A. Well, for example, when we are</p> <p>23 responding to a lot of overdoses in one day, we</p> <p>24 start running into a domino effect. What will</p> <p>25 happen is since the overdoses are so serious</p>	<p style="text-align: right;">Page 233</p> <p>1 A. Well, we have two different kinds of</p> <p>2 rig maintenance. We -- there's maintenance that</p> <p>3 we do in the station, which would be us being</p> <p>4 responsible -- us being the firefighters, being</p> <p>5 responsible for keeping the rig clean, making</p> <p>6 sure the fluid levels are appropriate, cleaning</p> <p>7 out compartments, cleaning the equipment. We</p> <p>8 all consider that rig maintenance.</p> <p>9 What is even more challenging, and</p> <p>10 has been more of a drain on our system lately,</p> <p>11 is as the call volume increased secondary to</p> <p>12 this crisis, we started realizing that -- our</p> <p>13 quarterly was a very common preventative</p> <p>14 maintenance rotation that's based on mileage.</p> <p>15 Instead of having an ambulance come in, let's</p> <p>16 say, four times a year, they were coming in six</p> <p>17 times a year. Just even the amount of gasoline</p> <p>18 that we used went up.</p> <p>19 So when you start talking about a,</p> <p>20 you know, 30 percent increase in the amount of</p> <p>21 preventative maintenance that you need to do,</p> <p>22 but you multiply that by 13 apparatus, suddenly</p> <p>23 now you're running out of mechanics and you're</p> <p>24 hiring them on overtime on Saturdays to help</p> <p>25 keep up with the maintenance, so, again, there's</p>

<p style="text-align: right;">Page 234</p> <p>1 a bit of a snowball effect there. And then that 2 impacts the long-term life expectancy of the 3 rigs just based on the additional miles we've 4 been experiencing. 5 Q. Okay. So how does -- this started 6 with you were explaining that there can be a 7 snowball effect with too many calls in one day. 8 So if somebody is performing rig maintenance and 9 there's a call, they have to stop and go on the 10 call? Is that -- 11 A. That would be accurate, yes. 12 Q. What about building maintenance, 13 same situation? 14 A. Absolutely. Yard work, windows. I 15 mean, we -- we live in these stations 24/7, 365, 16 so maintaining them at a high level of readiness 17 is important. 18 Q. And my question was, though, if 19 somebody is performing building maintenance and 20 there's a call, they have to stop what they're 21 doing with the building maintenance and go out 22 on the call? 23 A. That would be accurate. 24 Q. And you also mentioned inspections, 25 I believe. Is that the same scenario, where if</p>	<p style="text-align: right;">Page 236</p> <p>1 that the firefighters themselves could be doing 2 on a regular basis, which then has the ability 3 to impact some overtime issues at our fire 4 maintenance facility. 5 Q. Same question for rig maintenance. 6 If the firefighters at a station are too busy to 7 perform all of the rig maintenance because of 8 the number of calls they're receiving, are they 9 then paid overtime to perform the required rig 10 maintenance? 11 A. No. They would not be paid 12 overtime. It would be a matter of eventually 13 the potential for mechanical damage due to 14 inadequate fluid levels and stuff exists, but 15 there would not be a specific additional 16 manpower charged for that. 17 Q. How do the shifts work for 18 firefighters in AFD? Is it 24 on, 48 off, or -- 19 A. Yes. 20 Q. Is that the same for EMS, the bureau 21 of EMS, or the paramedics and EMTs? Do they 22 work the same shifts, 24 on, 48 off? 23 A. In the general sense of all of our 24 operational personnel work the 24/48. 25 Q. Is there ever -- is there ever down</p>
<p style="text-align: right;">Page 235</p> <p>1 somebody is performing a building inspection and 2 there's a call, they have to stop what they're 3 doing and go out on the call? 4 A. That's a close to accurate 5 description. We will take our apparatus, go out 6 into the neighborhood that that apparatus is 7 assigned to and inspect businesses. We do that 8 as a preventative measure to hopefully find fire 9 hazards and have them mitigated before a fire 10 should actually occur. We do that, what we call 11 an in-service status, so should a call come in 12 while they're out doing that inspection, they 13 will stop what they're doing, hop on the rig and 14 go to that call. 15 Q. Returning back to building 16 maintenance for a second, if -- if the AFD 17 employees at a station are too busy because of 18 calls that they -- to the point that they fall 19 behind on the building maintenance, are they 20 then paid overtime to catch up on the building 21 maintenance? 22 A. The firefighters themselves would 23 not be paid overtime, but what we would end up 24 doing is having to utilize some of our personnel 25 out of fire maintenance to do some of the chores</p>	<p style="text-align: right;">Page 237</p> <p>1 time during the 24-hour shifts, time when 2 there's nothing specific that has to be 3 accomplished? 4 MS. FLOWERS: Object to the form. 5 A. Yes. 6 Q. Are the AFD employees required to 7 take a certain amount of break time during those 8 24-hour shifts? 9 A. No. 10 Q. Do you have an estimate on how much 11 down time on average the AFD employees have 12 during one of these 24-hour shifts? 13 A. I do not. 14 Q. Do you know how that number could be 15 calculated? 16 MS. FLOWERS: Object to form. 17 A. I do not. 18 Q. Looking back at the exhibit you have 19 in front of you, do you see where Chief Natko 20 wrote -- it says, "Opioid/Drug, 1,279," and then 21 right below that it says, "Mental Health, 22 \$2,534." Do you know what he's referencing 23 here? 24 A. I do not. 25 Q. Is it consistent with your</p>